

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK**

CONSUMER FINANCIAL  
PROTECTION BUREAU, et al.,

Plaintiff,

v.

Case No. 24-CV-40-LJV

STRATFS, LLC (f/k/a STRATEGIC  
FINANCIAL SOLUTIONS, LLC), et  
al.

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.

**MOTION TO DISSOLVE TEMPORARY RESTRAINING ORDER**

For the reasons set forth in the accompanying memorandum of law, Defendants StratFS, LLC (f/k/a Strategic Financial Solutions, LLC), Strategic Client Support, LLC, Strategic CS, LLC, Strategic FS Buffalo, LLC, Strategic NYC, LLC, BCF Capital, LLC, T Fin, LLC, Strategic Consulting, LLC, Versara Lending, LLC, Strategic Family, Inc., Anchor Client Services, LLC, Bedrock Client Services, LLC, Boulder Client Services, LLC, Canyon Client Services, LLC, Carolina Client Services, LLC, Great Lakes Client Services, LLC, Guidestone Client Services, LLC, Harbor Client Services, LLC, Heartland Client Services, LLC, Monarch Client Services, LLC, Newport Client Services, LLC, Northstar Client Services, LLC, Option 1 Client Services, LLC, Pioneer Client Servicing, LLC, Rockwell Client Services, LLC, Royal

Client Services, LLC, Stonepoint Client Services, LLC, Summit Client Services, LLC, and Whitestone Client Services, LLC, i (hereinafter collectively “Moving Defendants”), respectfully move this Court, pursuant to Federal Rule of Civil Procedure 65(b)(4), to dissolve the temporary restraining order entered on January 11, 2024. Alternatively, Defendants respectfully requests that the Order must be modified so that Strategic can continue to provide support to the law firm as they serve their client’s needs. Specifically, Strategic proposed that the TRO must be modified to allow Strategic: (1) controlled and supervised access to the various consumer accounts that it believes either the Receiver or the CFPB has taken steps to impede; (2) access to certain IT infrastructure, including various Microsoft accounts, Salesforce, 8X8 and workchat/workplace to communicate; and (3) sufficient support personnel for Strategic to provide the required and necessary services to the law firms and the law firms’ clients.

WHEREFORE, Plaintiffs respectfully request this Court grant this motion along with any further relief this Court deems just and proper.

DATED: January 16, 2024  
Buffalo, New York

Respectfully submitted,

s/ Dennis C. Vacco  
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